

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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<i>In re</i>	:	
	:	PROMESA
THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO RICO,	:	
	:	
as representative of	:	Case No. 3:17-cv-03283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO,	:	(Jointly Administered)
<i>et al.</i>	:	
	:	
Debtors. ¹	:	
	X	

APPLICATION FOR ADMISSION PRO HAC VICE

TO THE HONORABLE COURT:

COMES NOW John F. Lynch (hereafter, the “Applicant”) and, pursuant to Rule 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, as incorporated by Rule 1001-1(b) of the Local Bankruptcy Rules as well as this Court’s *Ninth Amended Notice, Case Management and Administrative Procedures Order* (Docket No. 7155 of Case No. 17-03283 (LTS)) (the “CMP Order”), requests to be permitted to appear and participate in this case, in association with the law firm of McConnell Valdés, LLC, and the undersigned members of the bar of this Court, in representation of creditor and party-in-interest Cortland

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Capital Market Services LLC (“Cortland”), as Administrative Agent for lenders under that certain Credit Agreement, dated as of May 4, 2012 among PREPA, Scotiabank de Puerto Rico, and the lenders party thereto. Applicant respectfully shows:

1. Applicant is an attorney and member of the law firm of Wachtell, Lipton, Rosen & Katz, with offices at:

Address	WACHTELL, LIPTON, ROSEN & KATZ 51 West 52nd Street New York, New York 10019
Email	JLynch@wlrk.com
Telephone No.	212.403.1373
Fax No.	212.403.2373

2. Applicant will sign all pleadings with the name John F. Lynch.

3. Applicant has been retained personally or as a member of the above-named firm by Cortland Capital Market Services LLC, to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the District of Puerto Rico

4. Since 1998, Applicant has been and presently is a member in good standing of the bar of the highest court of the State of New York, New York State Bar No. 2921310, where Applicant regularly practices law.

5. Applicant has also been admitted to practice before the following courts:

<u>Court:</u>	<u>Admission Date:</u>
New Jersey	1997
U.S. Supreme Court	2010

U.S. Court of Appeals, First Circuit	2013
U.S. Court of Appeals, Second Circuit	2011
U.S. Court of Appeals, Fifth Circuit	2008
U.S. District Court, Southern District of New York	2001
U.S. District Court, Eastern District of New York	2001
U.S. District Court, District of New Jersey	1997

6. Applicant is a member in good standing of the bars of the courts listed in paragraph 5.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction. Applicant has no pending disciplinary complaints as to which a finding has been made that such complaint should proceed to a hearing.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. Applicant has not been denied admission to, been disciplined by, resigned from, surrendered his license to practice before, or withdrawn an application for admission to practice before any court or jurisdiction, while facing a disciplinary complaint.

10. Applicant has not previously filed for pro hac vice admission in the United States District Court for the District of Puerto Rico.

11. Local counsel of record associated with Applicant in this matter are:

Nayuan Zouairabani, Esq.
MCCONNELL VALDÉS LLC
270 Muñoz Rivera Avenue, Suite 7
Hato Rey, Puerto Rico 00918
Telephone: 787-250-5619
Facsimile: 787-759-9225
E-mail: nzt@mcvpr.com

12. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico, which provide in part that attorneys appearing pro hac vice must comply with the provisions set forth therein and pay an admission fee of \$300 per appearance in each new case before the Court. Accordingly, payment of the pro hac vice admission fee is attached hereto in the form of a check or money order payable to: "Clerk, U.S. District Court."

WHEREFORE, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled case only.

Date: July 11, 2019.

John F. Lynch
Printed Name of Applicant

/s/ John F. Lynch
Signature of Applicant

I HEREBY CERTIFY, pursuant to Rule 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, that I consent to the designation of local counsel for all purposes.

Date: July 11, 2019.

Nayuan Zouairabani
Printed Name of Local Counsel

/s/ Nayuan Zouairabani
Signature of Local Counsel

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of July, 2019.

I HEREBY CERTIFY that on this same date, we electronically filed the document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants.

MCCONNELL VALDÉS LLC

*Attorneys for Cortland Capital Market Services LLC, as
Administrative Agent*

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By: s/Nayuan Zouairabani
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